

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Angie Moquette Miller

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

All American Business Centers LLC
D.M.B Medical Billing Services LLC
Life Transitions LLC
Conner Creek Life Solutions LLC
Blank Law PC
Blue Cross Blue Shield of Michigan
Easter Seals of Michigan AMHS
Michigan Department Health and Human Services

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:21-cv-10687
Judge: Berg, Terrence G.
MJ: Ivy, Curtis
Filed: 03-24-2021 At 01:05 PM
CMP ANGIE MOQUETTE MILLER V ALL AMERICAN
BUSINESS CENTERS LLC ET AL (SS)

Jury Trial: ☒ Yes ☐ No
(check one)

Complaint for a Civil Case

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Angie Moquette Miller</u>
Street Address	<u>40206 Ashland Dr.</u>
City and County	<u>Sterling Heights (Macomb)</u>
State and Zip Code	<u>Michigan 48313</u>
Telephone Number	<u>586 551-3102</u>
E-mail Address	<u>lifespancounselingpllc@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Blue Cross Blue Sheild of Michigan</u>
Job or Title (if known)	<u>Legal Counsel (Bruce Henderson)</u>
Street Address	<u>600 East Lafayette</u>
City and County	<u>Detroit (Wayne County)</u>
State and Zip Code	<u>Michigan 48226</u>
Telephone Number	<u>313 225-9000</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Easter Seals Michigan AMH Services</u>
Job or Title (if known)	<u>Juliana Harper (CEO)</u>
Street Address	<u>2399 E Walton Blvd.</u>
City and County	<u>Auburn Hills (Oakland County)</u>
State and Zip Code	<u>Michigan 48326</u>
Telephone Number	<u>248 475-6400</u>
E-mail Address (if known)	<u></u>

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Angie Moquette Miller</u>
Street Address	<u>40206 Ashland Dr.</u>
City and County	<u>Sterling Heights (Macomb County)</u>
State and Zip Code	<u>Michigan 48313</u>
Telephone Number	<u>586 551-3102</u>
E-mail Address	<u>lifespanscounselingpllc@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>All American Business Centers LLC</u>
Job or Title (if known)	<u>Dominic Maratta (Owner/financials)</u>
Street Address	<u>13854 Lakeside Circle</u>
City and County	<u>Sterling Heights (Macomb County)</u>
State and Zip Code	<u>Michigan 48313</u>
Telephone Number	<u>586 580-4977</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>DMB Medical Billing</u>
Job or Title (if known)	<u>Shelley Taglione (Owner)</u>
Street Address	<u>42928 Versailles Rd.</u>
City and County	<u>Canton (Wayne County)</u>
State and Zip Code	<u>Michigan 48187</u>
Telephone Number	<u>734 414-0754</u>
E-mail Address (if known)	<u></u>

Defendant No. 3

Name	<u>Life Transitions LLC</u>
Job or Title (if known)	<u>David Judd (Owner)</u>
Street Address	<u>43171 Dalcoma Dr. Suite 7</u>
City and County	<u>Clinton Township</u>
State and Zip Code	<u>Michigan 48038</u>
Telephone Number	<u>586 267-1002</u>
E-mail Address (if known)	<u></u>

Defendant No. 4

Name	<u>Blank Law PC</u>
Job or Title (if known)	<u>Nicole Blank (attorney of law) member</u>
Street Address	<u>444 S. Washington Ave. Suite 100</u>
City and County	<u>Royal Oak (Oakland County)</u>
State and Zip Code	<u>Michigan 48067</u>
Telephone Number	<u>248 505-5929</u>
E-mail Address (if known)	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Angie Moquette Miller</u>
Street Address	<u>40206 Ashland Dr.</u>
City and County	<u>Sterling Heights (Macomb)</u>
State and Zip Code	<u>Michigan 48313</u>
Telephone Number	<u>586 551-3102</u>
E-mail Address	<u>lifespanscounselingpllc@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>McLaren Health Plan Inc.</u>
Job or Title (if known)	<u>d/b/a McLaren Health Plan Community</u> <u>Resident Agent Nancy Jenkins</u>
Street Address	<u>G 3245 Beecher Rd.</u>
City and County	<u>Flint (Genesee County)</u>
State and Zip Code	<u>Michigan 48532</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Meridian Health Plan</u>
Job or Title (if known)	<u></u>
Street Address	<u>1 Campus Martius # 700</u>
City and County	<u>Detroit (Wayne County)</u>
State and Zip Code	<u>Michigan 48226</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Angie Moquette Miller</u>
Street Address	<u>40206 Ashland Dr.</u>
City and County	<u>Sterling Heights (Macomb)</u>
State and Zip Code	<u>Michigan 48313</u>
Telephone Number	<u>586 551-3102</u>
E-mail Address	<u>lifespanscounselingpllc@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Beacon Health Options Inc</u>
Job or Title (if known)	<u>d/b/a Beacon Health Strategies LLC</u>
Street Address	<u>40600 Ann Arbor Road East Suite 201</u>
City and County	<u>Plymouth (Wayne)</u>
State and Zip Code	<u>Michigan 48170</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Conner Creek Life Solutions</u>
Job or Title (if known)	<u>c/o Karicia Carter</u>
Street Address	<u>4777 East Outer Dr.</u>
City and County	<u>Detroit (Wayne County)</u>
State and Zip Code	<u>48313</u>
Telephone Number	<u>248 495-8985</u>
E-mail Address (if known)	<u></u>

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

Defendant No. 3

Name	<u>Conner Creek Life Solutions LLC</u>
Job or Title (if known)	<u>Attorney Willard Holt III (Registered agent)</u>
Street Address	<u>38505 Woodward Ave Suite 100</u>
City and County	<u>Bloomfield Hills (Oakland County)</u>
State and Zip Code	<u>Michigan</u>
Telephone Number	<u>313965-3900</u>
E-mail Address (if known)	<u></u>

Defendant No. 4

Name	<u>Michigan Department of Human and Health Service</u>
Job or Title (if known)	<u>Kate Massey/Medicaid Director</u>
Street Address	<u>400 South Pine</u>
City and County	<u>Lansing</u>
State and Zip Code	<u>Michigan</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A.**If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

I, the plaintiff was denied equal protections and due process within the confines of the 14th admendment of legal proceedings at the State level, including complaints to AG office has not acknowledged, nor heard. The racial discrimination I've experienced runs deep as a reminder of modern slavery, i.e further oppressed by others fraudently using the credentials that I've worked so hard to acheive and accomplish.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____,
is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____,
is incorporated under the laws of the State of (name) _____,
and has its principal place of business in the
State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the
State of (name) _____. Or is a citizen of (foreign
nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated
under the laws of the State of (name) _____, and
has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of
(foreign nation) _____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

Additional Information:**Statement of Claim**

The defendants collaborated and committed an egregious, and intentional " tortious " act of malicious persecution of discrediting my professional credentials with several payers causing severe economic injury to my self-employed status and contracts with several major insurance payers including Medicare and Tricare. Plaintiff have suffered loss of income as a direct result of the defendants improper and fraudulent use of my professional credentials, and sometimes altering my credentials to receive a higher payment for services for an institutional setting that was not rendered by this plaintiff. In addition to using my credentials in an unauthorized manner, the defendants furthered their schemes by creating shell/phantom companies and/or attached my credentials to the phantom companies and sometimes attached my name and credential with an actual medical group whom I had no affiliation. The defendants improper conduct continues to be ongoing as evidenced by opening/intercepting all of my mail, recent attempt to open a bank account in my name, gaslighting tactics, harassment, retaliation, intimidation and blatant abuse power of their high-ranking positions. Please see the following statement of facts.

Statements of Facts

1.All American Business Centers LLC, it's Owner Dominic Maratta and management team conducted schemes using phantom and shell companies in marketing advertisements through google, other search engines and illegally used my name and credentials as part of non-existing companies. All American Business Centers LLC aided and abetted the defendants D.M.B Medical Billing LLC and Life Transition LLC in the continuation of billing fraudulent claims under the plaintiff ' s professional credentials with BCBSM, Beacon Health, Medicare, Magellan and insurance for Veteran under the False Claims Act. All American Business Centers rerouted/alterd plaintiff ' s mailing correspondences from her administrative address 40206 Ashland Dr. Sterling Heights MI 48313 to their address at 13854 Lakeside Circle, Sterling Heights Michigan without plaintiff ' s authorization around May 2018. Plaintiff received a written report from Best Buy ' s Geek Squad computer analysis around May 2019 explaining that plaintiff ' s computer's firewall was disabled, files merged with All American Business Centers giving the possible appearance that plaintiff was an associate/partner with All American Business Centers LLC and/or other phantom entities at that site location. In addition, files were missing from plaintiff ' s computer prior to June 1, 2019. All American Business Centers, Life Transitions LLC, and their affiliates have very sophisticated software development applications through device capabilities of rerouting, gaining access to fax transmittals, forwarding calls, and committing wire fraud through the use of telecommunications.

Additional Information:

2. Following an informal investigation from BCBSM field representative Raymond Evans (retired police officer) on January 23, 2018 whom interviewed me regarding an alleged complaint by my client's brother that I may have committed fraud by stealing my client's identity because he was not aware of the services I provided to his brother, the investigator suggested that I do an appeal to be reimbursed for additional services that I was not reimbursed by BCBSM. On the next day of January 24, 2018, Mr. Evans came for a second interview and Blatantly lied by making a false statement that the AFC Home Provider told him that she did not know the plaintiff. Despite the fact that the group home provider was a witness, provided consent, and acknowledged my services, and spoke with both the investigator and client's brother regarding the services I provided, BCBSM investigator continued to pursue these false allegations of identity theft, false claims and being an unlicensed health care provider. This was clearly a scheme devised by a BCBSM, "fixer" to discredit and cause defamation to my character, and harm to my professional reputation to deflect the wrongs and acts that have been committed in a criminal manner by Blue Cross Blue Shield Michigan and their associates. Blue Cross Blue Shield of Michigan have enabled others and participated in schemes with others through their EDI billing software system to frequently bill various payers including Medicare, Tricare, Beacon Health, Medicaid with provider's credentials that were not authorized, nor known by the provider. BCBSM have manipulated and devised credentialed demographics on several occasions that were not authorized by me, nor known by me. They have manipulated throughout the years and is currently doing so now, manipulating my credentials to give the appearance that I am an institutional/facility provider. In fact, I am outpatient professional provider. BCBSM have added initials under my credential as a supervisor. They have enabled other entities who are collaborating in this scheme to attach my credential to their tax Id and/or phantom company tax ID. This behavior has been occurring maybe as earlier than 2012. BCBSM have applied severe punitive action onto me due to their wrong doing. I have been taken out of the web-based portal which I have had access to for several years. They are requiring me to do only paper claims as I am on an unsubstantiated PPURR review, in addition to these alleged false charges. They have been very in cooperative in providing me with a profile. I was informed and have documented that other entities have had access to my web-based portal and have been interacting with "off shore accounts". General Counsel has been non-responsive to my call

3. D.M.B Medical Billing Services LLC, (Owner Shelley Taglione) whom plaintiff contracted billing services in 2005 terminated contract agreement with D.M.B on December 31, 2018 after plaintiff had learned that biller was not communicating with plaintiff regarding overpayments demand letters from Medicare due to double billing for the same date of services by another entity. This take back of overpayments resulted from D.M.B. Medical Billing LLC, Life Transitions LLC, and All-American Business Centers LLC all collaborated in using my credentials as a home health care agency affiliating my credentials with Life Transitions LLC which is not accurate. In addition, the billers daughter, Stephanie Harper had registered and created an administrative portal unauthorized in my name to collect checks and bill insurances for veterans (Humana *Mil-Hay*)

Additional Information:

portal unauthorized in my name to collect checks and bill insurances for veterans (Humana Military) in December 2018 after I provided verbal confirmation that I will be terminating their services effective December 31, 2018. due to their erroneous billing methods, with Medicare and BCBSM which I discovered later that biller was billing both Medicare and BlueCross as primary which resulted in payment recoupments from my revenue after biller received payment. Plaintiff also discovered that both All American Business Centers LLC and D.M.B Medical Billing Services LLC continued to use my credentials in October 2019 several months after I terminated my lease with All American Business Centers LLC and terminated my contract with D.M.B. Medical Billing LLC. This fraudulent activity for billing veterans using my credentials was reported for the second time to Veterans OIG for fraud and abuse. In addition, D.M.B Medical Billing was intercepting plaintiff ' s checks for veterans see by plaintiff and rerouting those checks to her address; thus, D.M.B. Medical Billing Services was receiving checks from Tri-west (Veteran Insurance) for veterans that were seen by this plaintiff. Plaintiff believes that additional checks from Tri-West may have been received by biller for clients that was not seen and/or rendered services by this plaintiff.

4. Due to the case in question with BCBSM false allegations, an attorney was hired from Blank Law PC (Nicole Blank Becker) who was given \$25,000.00 in a form of a cashier check for a retainer fee. This attorney misled me to believe that the allegations of false claims were valued at tens of thousands of dollars without any documentation of the actual charges. In actuality, the alleged fraud allegations were valued at \$4167.00 was paid back in full to BCBSM as they held money back from my other clients who were BCBSM beneficiaries from my payable account. The attorney was referred to me from an attorney Abdo who explained that he would prefer that I see Ms. Blank because he does not travel often to Wayne County, as the bulk of his cases are in Macomb county. Upon being booked the Wayne City Police Department on 11/16/2018, the Detective Amore who filed the charges was missing and the department could not find any information or charges against me (I was not on file). After being booked, I arrived for the arraignment at 29th district court and noticed that the charging document had a different name, different DOB, different address and had a slightly different license number compared to mine of a deceased individual, Angie Marie Miller DOB 10/19/1961 and who passed away on 1/08/2018 as I pulled up her name on the internet. The court scribbled out the name of Angie Marie Miller and wrote my name over hers and added my address and date of birth without asking for my Identification to confirm my identity. Throughout the legal process with Ms. Blank, I began to lose trust in Ms. Blank as she discouraged me from filing police reports onto the individuals who were using my credential illegally and stated that I would look guilty in doing so. In addition, Ms. Blank stalled in getting the affidavit from co-owners signed from group home provider who were both witnesses for my case. Attorney refused to give some money back upon my request as I asserted that I did most of the work as she was on several vacations. I began to lose trust and later discovered that she was working on the behalf of the prosecution via of looking into my police reports and had interactions with billers that were part of my adversaries. It was also suspicious that Ms., Blank asked for requested copies of my birth certificate and social security card because it was not used

Additional Information:

of my birth certificate and social security card because it was not used as part of my defense. and requested a list of all of my paneled payers which I found to be an odd request, when my case only involved BCBSM and no other payers. Shortly after, each payer began terminating contracts with me as a result of case with discontinued contracts with me due to the BCBSM pending case.

5. I was employed at Easter Seals Adult Mental Health Services from 2003 and 2011. In 2011, filed a discriminatory with EEOC due to hostile work environment, racial discriminatory practices, denial of promotions despite high performance rating. I resigned in my position as a Geriatric Social Worker/Therapist my employment on December 31, 2011 involuntary due to ongoing hostile environment, harassment, bullied with severe intimidation and humiliation evidenced by being mandated to enter the building each morning to confirm that I am working. This was blatant discrimination. It was discovered from my investigation of BCBSM, that Easter Seals too continued to use my credentials illegally with United Health Care from 2012-2015 as they used my credentials attached to their EIN/TIN. I was informed of this information by Optum Behavioral Health/United Health Care which has created a block for me to be paneled with United Health Care (Medicare, Medicaid and Commercial)

6. After my first and initial enrollment application in February 2019 to become a Medicaid provider in the in the state of Michigan which was successfully approved in May 2019, I was abruptly terminated with a letter from Michigan Department of Human and Health Services (Medicaid Enrollment) signed by Kate Massey, Medicaid Director. The letter stated that that I am a danger to clients as a result of the case with BCBSM. This letter was emailed and attached to this email was a forwarding list to all Medicaid Providers in Michigan who received the same email. This caused further humiliation, by signaling to discredit my character within the mental health sector among community mental health agencies, managed care organizations, HMO, behavioral health agencies, integrated healthcare agencies and other various sources of Medicaid Payers. This appeared to be a " dog whistle " signaling every provider to place me on that black list to cause additional damage to my solo practice. Upon my request for an appeal and going before a before an administrative law judge, I presented factual documents and evidence to show that I am a victim of identity theft and bad actors were using my credentials to commit fraud, even across state lines in States that I was not licensed to practice. The ALJ and MDHHS Medicaid was not able to explain who and/or how my credentials became enlisted in the Medicaid Champs Portal without my knowledge and/or authorization since 2012. The court refused to respond with an answer, denied FOIA/PA rights as I wanted to find out names of Beneficiaries whom I did not see. I remain on the summary suspension list/exclusion list for Michigan Medicaid with no resolution and no valid explanation.

6. Beacon Health Options (Formerly Value Options and Military One Source) whom I had a very good working relationship and certified through their panel to provide services since 2005 had terminated my contract in October 2019 due to Medicaid Suspension in Michigan. In addition to the termination of the contract in October 2019, Beacon Options reported the termination of my contract to the (National Provider Data Base) with as a result of the Medicaid Suspension, not the BCBSM case. I have been

Additional Information:

6. Beacon Health Options (Formerly Value Options and Military One Source) whom I had a very good working relationship and certified through their panel to provide services since 2005 had terminated my contract in October 2019 due to Medicaid Suspension in Michigan. In addition to the termination of the contract in October 2019, Beacon Options reported the termination of my contract to the (National Provider Data Base) with as a result of the Medicaid Suspension, not the BCBSM case. I have been appealing this case with Beacon Health since 2019 and still there has been no resolution. Throughout the appeal process, I have discovered that the defendants, and other entities unknown to me have been using my credential to bill Beacon Health Options Products, including Beacon Health Strategies (another form of Medicaid) in Michigan and in other States outside of Michigan which I am not licensed to practice. This has been occurring since 2007 according to their records. It has also come to my attention that United Health Care, McLaren and Meridian have facilitated and enabled the defendants to fraudulently call using my credentials in an unauthorized manner. they learned that I had a Medicaid summary suspension. In addition to Beacon Health Options Meridian Health Plan and McLaren Health Plan.

8. Conner Creek Life Solutions have access to programs that I have created for only consultation and training purposes. Although they had permission to use these programs, they took it upon themselves to employ my credentials as an affiliate/board member illegally to bill various payer systems including veterans, Medicare, Medicaid and initiated credentialing applications in my name to perform inpatient substance abuse treatment unauthorized and without my knowledge. BCBSM and Conner Creek Solution has collaborated to commit fraudulent false claims under my credentials withwin a rehab/facility setting which I am not affiliated.

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

The defendants behaviors were malice, intentional, inhumane, and irreparable. They violated every aspect of my being, my privacy, my mail, my medical records, taunted and exploited my adults sons mental illness, gaslighting , gained access to my medical, phone/fax interceptions.They took my life.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

3. D.M.B Medical Billing (Owner Shelley Taglione) whom Plaintiff contracted billing services in 2005 terminated services with D.M.B on December 31, 2018 after learning that biller was not communicating with Plaintiff regarding overpayments demand letters from Medicare due to double billing for the same date of services. This overpayment resulted from D.M.B Medical Billing LLC and Life transitions LLC using my credentials as a home health care agency affiliating my association with Life Transitions LLC which was not accurate. In addition , the billers daughter Stephanie Harper had created an administrative portal unauthorized im my name to collect and bill insurances for veterans (humana military) in December 2018 after I provided them verbal confirmation that I will be terminating their services effective December 31, 2018 due to their erroneous billing methods with Medicare and BCBSM. Plaintiff discovered that All American Business Centers LLC and D.M.B Medical billing continued to use my credentials in October 2019 several months after I terminated my lease with All American Business Centers LLC and Terminated my contact with D.M.B Medical billing LLC. THis information was report for the second time with Veterans OIG for fraud and abuse. In addition D. M. B Medical Billing was intercepting plaintiff's checks for veterans seen by plaintiff and rerouted those checks to her address, thus, DMB was receiving checks from Tri-west (Veterans insurance) for veterans that were seen by this plaintiff. Plaintiff believes that additional checks from tri-west may have been received by biller for clients that was not seen by this plaintiff.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

These acts that the defendants have committed and are still committing are unimaginable, unconscionable and inhumane which have caused and continues to cause great emotional suffering for myself (plaintiff) and my family. The experience and the emotional trauma which I have endured from the ill will of these defendants malicious intent to destroy my whole being (personally and professionally) will have an ever lasting impact on my life. I was violated in every aspect of my being. I was solely stripped of my due process rights within the judicial system, the privacy rules did not apply to me due to being a woman of color, experiencing the depths of racial discrimination including hipaa violation, defendants falsifying documents, exploiting my medical records, interception of my mail, phone, bank accounts, and taunting/exploiting my sons with mental illness. the damages are far beyond psychological, this was irreparable. I am seeking exemplary damages in the amount \$67,000.000.00 as this experience has taken my livelihood which I will have to begin to rebuild in terms of my professional life and moving pass the emotional trauma in trusting our legal processes and system and protecting the most vulnerable which was my purpose in life as a clinical social worker I enjoyed doing for 26 years with both a Masters and Doctors Degree in Social Work. I hope to regain that role once again.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 24, 2021.

Signature of Plaintiff

Printed Name of Plaintiff


Angie Moquette Miller

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

County in which action arose: _____

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
Angie Moquette Miller**DEFENDANTS**

All American Business Centers LLC, D.M.B Medical Billing LLC, Blue Cross Blue Shield of Michigan, Easter Seals Michigan AMHS, Conner Creek Life Solutions LLC, Life Transitions LLC, MDHS (Medicaid), Meridian, Beacon Health

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(b) County of Residence of First Listed Plaintiff Macomb
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in one Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|---------------------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 CONSUMER CREDIT <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amcr. w/Disabilities - Employment <input type="checkbox"/> 446 Amcr. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

VII. REQUESTED IN COMPLAINT:
☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.
DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

March 23, 2021

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RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

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